

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Amendment of Part 97.201(b) of the
Commission's Rules Regarding Auxiliary
Operation in the Amateur Service

RM - 10313

By W. Lee McVey, P.E.,

To: Chief, Public Safety and Private Wireless
Branch, Wireless Telecommunications Bureau

COMMENT

This subject Petition submitted by the Kenwood Corporation should not be adopted for several reasons.

A. 2m Band Already Utilized to a Great Degree

First, and foremost, the 2-meter amateur band is already utilized to a great degree in larger metropolitan areas. And, the addition of auxiliary station operation using 5kHz narrow band FM modulation in order to control remote base stations will only further aggravate this problem.

In fact, the requirement that such auxiliary operation be on frequencies above 1.25m should be revised to only permit auxiliary operation on 70cm and above, especially since the 1.25m amateur band has lost spectrum and is, in part, shared with other services.

B. Development of New Technology Devices by Amateurs

In paragraph two, page one, Petitioner states that the use of 2m for auxiliary control would “allow the development and use by amateurs of new technology devices.” It is inconceivable how such a manufactured remote control system using narrow band voice FM would encourage the creation of new technology devices by amateur radio operators.

C. Useful in Disaster and Emergency Communications

In paragraph 3, page 2, Petitioner states that “ it’s an innovative system, useful in a variety of contexts, especially in emergency and disaster relief communications.” The need for multiple stations and multiple operators on 2m in such situations could enhance potential for interference. Further, the need to tend to such activities as base station power supply and integrity in emergencies and disasters would limit the utility of such a concept.

Further, unless the base or remote stations enjoy almost direct, line of sight ideal operation, effective utility of a roaming, fixed-frequency mobile system will be limited to only several miles from the controlled station.

D. Need for More Efficient and Flexible Technologies

In paragraph 1, page 3, petitioner states, in part “The Commission’s continuous trend...less regulation and encouragement of more efficient and more flexible current technologies.” Clearly, as the Petitioner describes, new means for auxiliary station control and operation needs to be more efficient and flexible. Use of narrow band FM modulation,

unfortunately, is neither more efficient nor more flexible. However, spectrum-conserving, digital modes such as spread spectrum would enable auxiliary station control, yet offering benefits of secure auxiliary station control with minimal interference besides perhaps an elevated noise floor to 70 cm and higher band users. The Petitioner does not request consideration of such a system.

E. Conclusion and Recommendation

The Petitioner has not demonstrated a clear and compelling need for changing the current band use restrictions on amateur auxiliary station control. And, adoption of the Petition would further limit the availability of the 2m band to other existing uses. The techniques proposed do not offer a new modulation technique nor more efficient use of existing amateur spectrum. Therefore, the petition should not be granted.

Respectfully Submitted,

(electronically)

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